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1 COOLEY GODWARD KRONISH LLP
2 JOHN C. DWYER (136533) (dwyerjc@cooley.com)
3 GRANT P. FONDO (181530) (gfondo@cooley.com)
4 AARON F. OLSEN (224947) (aolsen@cooley.com)
5 Five Palo Alto Square
3000 El Camino Real
Palo Alto, CA 94306-2155
Telephone: (650) 843-5000
Facsimile: (650) 857-0663

6 Attorneys for Defendants
7 BING YEH, YAW WEN HU, DEREK BEST,
MICHAEL BRINER, JEFFREY GARON, PAUL LUI,
8 ISAO NOJIMA, CHEN TSAI, TSUYOSHI TAIRA,
YASUSHI CHIKAGAMI, RONALD CHWANG,
and Nominal Defendant
9 SILICON STORAGE TECHNOLOGY, INC..

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

13 In re SILICON STORAGE TECHNOLOGY,
INC., DERIVATIVE LITIGATION

Master File No. C06-04310 JF

**STIPULATION AND [PROPOSED] ORDER
RESCHEDULING CASE MANAGEMENT
CONFERENCE PRESENTLY SCHEDULED
FOR AUGUST 10, 2007 AT 10:30 A.M.**

17 This Document Relates To:

18 ALL ACTIONS.

19 WHEREAS, the Court presently has a Case Management Conference scheduled in this
20 matter on August 10, 2007 at 10:30 a.m.;

WHEREAS, on March 15, 2007 nominal defendant Silicon Storage Technology, Inc. ("SST") publicly announced that the Chair of its Audit Committee, with the assistance of independent outside counsel and outside accounting experts, will conduct a voluntary review of its historical stock option grant practices covering the time from its initial public offering in 1995 through the current fiscal year;

WHEREAS, after SST publicly announces the results of the investigation into the historical stock option grant practices, Lead Plaintiffs intend to file a second amended

1 consolidated complaint (the “Second Amended Consolidated Complaint”); and,

2 WHEREAS, pursuant to the Stipulation and Order dated April 27, 2007, the Court granted
3 the parties’ stipulation: (1) that Defendants shall have no obligation to respond to the First
4 Amended Consolidated Complaint; (2) that Lead Plaintiffs shall have twenty-one (21) days after
5 SST announces the results of the investigation to file a Second Amended Consolidated
6 Complaint; and (3) set the briefing schedule for Defendants’ response to the Second Amended
7 Consolidated Complaint;

8 WHEREAS, on July 23, 2007, SST announced that it expects to restate its previously-
9 issued financial statements for the fiscal years 1997 through 2005 and for the quarters ended
10 March 31, 2006, June 30, 2006, and September 30, 2006 to correct errors related to accounting
11 for stock-based compensation expense;

12 WHEREAS, the Chair of SST’s Audit Committee has not yet completed the forensic
13 review of the option grants and the financial impact of using incorrect measurement dates has not
14 been finalized;

15 WHEREAS, the parties have agreed to continue the date of the Case Management
16 Conference and respectfully request the Court to continue the hearing to November 9, 2007 at
17 10:30 a.m.

18 IT IS SO STIPULATED.

19 Dated: August 2, 2007

COOLEY GODWARD KRONISH LLP

22 /s/Grant P. Fondo

Grant P. Fondo

23 ATTORNEYS FOR NOMINAL DEFENDANT
24 SILICON STORAGE TECHNOLOGY, INC.
25 AND THE INDIVIDUAL DEFENDANTS

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I, Grant P. Fondo , am the ECF User whose ID and password are being used to file this Stipulation and [Proposed] Order Rescheduling Case Management Conference Presently Scheduled for August 10, 2007 at 10:30 a.m. In compliance with General Order 45.X.B., I hereby attest that Nichole Browning has concurred in this filing.

Dated: August 2, 2007

SCHIFFRIN BARROWAY TOPAZ & KESSLER LLP

/s/ Nichole Browning

Nichole Browning

Alan R. Plutzik, Of Counsel ((Bar No. 077785)
L. Timothy Fisher, Of Counsel (Bar No. 191626)
Nichole Browning
2125 Oak Grove Road, Suite 120
Walnut Creek, CA 94598

SCHIFFRIN BARROWAY TOPAZ & KESSLER
Eric L. Zagar
James H. Miller
280 King of Prussia Road
Radnor, PA 19087

WOLF HALDENSTEIN ADLER FREEMAN &
HERZ, LLP
Betsy C. Manifold
Francis M. Gregorek
Rachele R. Rickert
750 B Street, Ste 2770
San Diego, CA 92101

CO-LEAD COUNSEL FOR LEAD PLAINTIFFS

DANZIGER, SHARPPIO & LEAVITT
Douglass Leavitt
150 S. Independence Mall West, Ste 1050
6th and Chestnut Streets
Philadelphia, PA 19106
COUNSEL FOR PLAINTIFF B. BAZARGANI

ORDER

PURSUANT TO STIPULATION AND FOR GOOD CAUSE SHOWN HEREIN, IT IS

SO ORDERED

DATED: 8/27/07



Judge of the U.S. District Court
Jeremy Fogel